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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emission Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

BEFORE THE CALIFORNIA ENERGY COMMISSION

In The Matter Of,)
)
AB 32 Implementation – Greenhouse Gas)
Emissions.)
)
)

Docket 07-OIIP-01

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY ON
ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS ON TYPE
AND POINT OF REGULATION ISSUES

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Pursuant to the Administrative Law Judges' Ruling Requesting Comments on Type and Point of Regulation Issues, issued November 9, 2007 ("Ruling") and the Administrative Law Judges' Ruling Extending Comment Deadlines and Addressing Procedural Matters, issued November 30, 2007, Southern California Edison Company ("SCE") submits the following responses to questions posed by the Ruling. SCE's comments here incorporate by reference its previous comments on point of regulation issues submitted to the California Public Utilities Commission ("CPUC") in this docket on August 6, 2007 and August 15, 2007.

I.

RESPONSES TO GENERAL QUESTIONS

Question 1. What do you view as the incremental benefits of a market-based system for GHG compliance, in the current California context?

A market-based approach is particularly well suited to reducing greenhouse gas (“GHG”) emissions. Regulations requiring a cap-and-trade system will enable regulated entities to easily and objectively evaluate and rank emission reduction measures based on cost (per mmt of reduced emissions). As a result, a well-designed market-based approach will allow regulated entities in California to comply with required GHG reductions at the lowest possible cost and the greatest benefit to California’s economy. Creditable estimates show that comprehensive market-based approaches can reduce the cost of meeting Assembly Bill 32’s (“AB 32”) GHG reduction requirements by over sixty percent.¹ Moreover, adoption of multiple specific regulations would require vast resources in order for regulators to analyze the marginal cost of abatement across the entire array of possible reduction opportunities in the economy, and then to administer and enforce such regulations. By contrast, adoption of a market-based cap-and trade approach would harness creativity and innovation and allow the entire regulated community to develop GHG reduction initiatives at the lowest possible cost to the California economy.

Question 2. Can a market-based system provide additional emissions reductions beyond existing policies and/or programs? Is so, at what level? How much of such additional emission reductions could be achieved through expansion of existing policies and/or programs?

A cap-and-trade program presents regulated entities with a strong financial incentive to promote efficient and effective emission reductions. A broad-based, multi-sector cap-and-trade system will allow regulated entities to fund and develop the most cost-effective emission reduction programs available. However, because California has taken such a strong leadership

¹ See Electric Power Research Institute, Program on Technology Innovation: Economic Analysis of California Climate Initiatives: An Integrated Approach, Volume 1: Summary for Policymakers at 1-7 (June 2007) (“As an indication of the stakes involved, specific regulatory approaches analyzed could increase costs by over 60% compared to comprehensive market-based approaches that preserve environmental gains and allow flexible choices to reduce costs.”).

role in environmental policy to date, many of the most cost-effective emission reduction opportunities are beyond state borders. A well-designed market-based approach that includes emission offsets presents California entities with a richer set of emission reduction opportunities than prescriptive programmatic approaches that are largely limited to reduction opportunities in California. As a result, prescriptive programmatic approaches to reducing emissions will not necessarily select the most efficient and cost-effective projects available.

II.

RESPONSE TO QUESTIONS REGARDING PRINCIPLES OR OBJECTIVES TO BE CONSIDERED IN EVALUATING DESIGN OPTIONS

Question 3. Do you agree with this set of objectives? Are there other objectives or principles that you wish to see included? If so, please include your recommendations and reasoning. Finally, please rank the objectives above, and any additional factors you propose, in order of importance.

SCE agrees with and supports this set of objectives with one addition. Policy-makers and regulators must carefully consider the influence of regulations on additional investments in infrastructure and innovation. Regulatory inconsistency can have a chilling influence on investments in both infrastructure and research and development. In particular, SCE strongly cautions California regulators against approving regulations which will have a significantly adverse impact on existing infrastructure investment. California cannot reasonably expect to attract new infrastructure or research and development funding, while at the same time enacting policies that will substantially erode the value of current infrastructure investments.

Regarding the order of the stated objectives by importance, in order to develop the greatest quantity of emission reductions, cost effectiveness should be ranked at the top of the list. The ability to integrate California's GHG program into a federal or regional program is also a critical objective that should be at or near the top of the list.

III.

RESPONSES TO QUESTIONS REGARDING LOAD-BASED CAP-AND-TRADE

DESIGN

Question 4. With a load-based cap-and-trade system, should exports from in-state generation sources be included and accounted for under the cap? Why or why not? If so, how? For example, exports could be captured in a cap-and-trade system by regulating in-state sources that export, or by counting the emissions associated with exported power, without any compliance obligation on the exporter. There may be other options as well.

There are problems associated with either including the exports in the cap or with excluding the exports from the cap. Including exports from in-state generation sources in a load-based cap would result in a significant risk of over-counting GHG emissions. Exported power that is re-imported into California would be counted first at the source and then again by the load-serving entity (“LSE”) when it is imported back into California. However, excluding such exports from the emissions cap can provide an incentive for higher-emitting generation to export its generation specifically to avoid the cap. These two conflicting challenges provide further explanation of why a load-based cap is inferior to either a deliverer/first seller (“First Seller”) or a national source-based cap.

Question 5. How extensive do you view the threat of contract-shuffling under a load-based program, given the accessibility of clean resources within the western interconnect? What mechanisms do you propose to combat this possibility? On what basis do you support your position?

Under a load-based program, real emission reductions will be challenged by contract-shuffling and emission leakage and a pervasive inability to track emissions to end users in any reasonably accountable way.² Research estimates show that a load-based system will result in significant leakage, and that regulatory efforts to prevent such contract shuffling would have the

² See Response of SCE to Administrative Law Judge’s Comments and Legal Briefs on Market Advisory Committee Report, filed August 6, 2007, at 8-11.

perverse result of significantly costing the California economy.³ A mechanism that could significantly reduce the potential of such gaming is a regional or national GHG program with responsibility for emissions as close to the source of the emissions as possible. Short of this, California regulators should design a system where regulated entities do not have incentives to inefficiently alter dispatch decisions.

Question 6. Which of these systems best accounts for all imports? What are the advantages and disadvantages of each potential tracking system in terms of accuracy, cost of development and administration of tracking systems, costs of administration to the parties, and overall costs to ratepayers? Are there alternative tracking approaches that you would recommend, and for what reasons?

None of the three options are capable of accurately matching a retail provider's load to its sources, including from imports. The inability to accurately match load to its sources is the fundamental and unavoidable flaw in a load-based approach.

Retail providers typically have a portfolio of resources to serve their load. Retail providers schedule and dispatch various resources from their portfolio based on their own load, as well as perceived market conditions. To comply with resource adequacy requirements, some retail providers are likely to have significant surplus resources to sell into the market during most of the year. For example, a retail provider that dispatches 11,500 MW into the electrical system may be using 7,000 MW for its own load and selling 4,500 MW into the market to a variety of market participants. However, it is difficult to determine which specific units of the retail provider's portfolio of 11,500 MW served its native load of 7,000 MW and which specific units should be attributed to the various buyers of 4,500 MW of electricity. The "settlement" that happens between counterparties is based on total MWh sold/delivered; however, settlement

³ See Electric Power Research Institute, Program on Technology Innovation: Economic Analysis of California Climate Initiatives: An Integrated Approach, Volume 1: Summary for Policymakers at 1-7 (June 2007) ("[T]he analysis shows that, because of contract shuffling, for every ton of emission reduction from the electric sector in California, there could be an increase of 0.85 tons of electric sector emissions from the rest of the western states. Conversely, until full regional emission trading systems are created, regulatory efforts to prevent such contract shuffling could significantly increase costs to California ratepayers. The peak loss in GSP with maximum contract shuffling allowed is 1.0%, but increases to 1.4% if contract shuffling is prevented.").

information does not always identify the units from which the energy came.⁴ This problem will be exacerbated after the California Independent System Operator's ("CAISO") Market Redesign and Technology Upgrade ("MRTU") market is implemented in 2008. In such a clearing market, all surplus resources are sold into the market and the buyers buy from this market, without any knowledge whatsoever of which buyer is getting paired with which seller, let alone with which specific resource. Under the MRTU market, sources will not be traceable to load.

Among the three options, the first option (contracts and settlement data) is the only viable option for matching load with sources. However, this option will need to rely on numerous (and somewhat arbitrary) assumptions and "default factors" that will inevitably lead to highly inaccurate results. The second option (development of a tracking system) and third option (TEAC) would as a practical matter be very difficult to implement and would not be viable options.

An alternative approach for tracking and attributing imports could involve the use of North American Reliability Council ("NERC") E-tag information. Western Electricity Coordination Council ("WECC") and its agents collect NERC E-tags for the entire WECC. The State of California could obtain such data from the WECC to determine all sources of imported energy and the entities who imported it into a California control area. This approach, however, also raises various issues. The sources of imported energy are likely to be other control areas and not specific units. Furthermore, it is likely that the importer will not be a retail provider and, if so, will not provide a direct link between imported electricity and the load it serves.⁵

Question 7. If a load-based approach is pursued, would the potential benefits of a full TEAC system be great enough to warrant the start-up and administrative costs?

SCE does not support the TEAC approach and considers it far inferior to the First Seller approach. One of the reasons that any load-based approach is inferior to the First Seller

⁴ One exception could be a "unit contingent sale" where the product is being sold from a specific unit if available.

⁵ This approach, however, could work well in a First Seller approach.

approach is the inability of a load-based program to effectively coordinate with the CAISO MRTU dispatch protocol. Emissions value cannot be included in the CAISO dispatch decision. The TEAC proposal attempts to address this by unbundling the commodity energy from the emissions characteristics. However, there are significant administrative costs to developing and implementing a TEAC approach. In addition, such an approach is not likely to be developed on a national scale. Therefore, if California were to develop a TEAC based program, the State would need to abandon it and start from scratch when a national program is implemented.

IV.

RESPONSES TO QUESTIONS REGARDING SOURCE-BASED CAP-AND-TRADE DESIGN OPTIONS

A. Pure Source-Based (GHG Regulation Of In-State Generation Only)

Question 8. Do you view this approach as compliant with Assembly Bill (AB) 32? Please support your answer.

AB 32 specifically requires the California Air Resources Board (“CARB”) to adopt regulations “to require the reporting and verification of statewide greenhouse gas emissions.”⁶ The statute defines “statewide greenhouse gas emissions” as “the total annual emissions of greenhouse gases in the state . . . whether the electricity is generated in state or imported.”⁷ The Legislature’s desire is reiterated later in the statute where CARB is mandated to promulgate regulations which “account for greenhouse gas emissions from all electricity consumed in the state, including transmission and distribution line losses from electricity generated within the state or imported from outside the state.”⁸ Additionally, AB 32 explicitly calls on CARB to adopt regulations that “minimize leakage” a term which is defined as “reduction in emissions of greenhouse gases within the state that is offset by an increase in emissions of gases outside the

⁶ Health & Safety Code § 38530(a).

⁷ Health & Safety Code §§ 38530 (a), 38505(m).

⁸ Health & Safety Code § 38530(b)(2).

state.”⁹ To the extent the aforementioned source-based program fails to report or verify emissions from imported resources, it would violate the Legislature’s explicit mandate.

Question 9. In light of the relatively high capacity factors of carbon-intensive facilities outside the state, how extensive do you expect the short-term threat of substituting higher-carbon imports for in-state generation to be? Might this possibility be dealt with through specific program design (e.g., allocations, limiting conditions, etc.)?

Under a pure in-state only source-based approach, there is a significant risk that higher-carbon imports will be substituted for in-state generation. The risk stems from out-of-state resources bidding into the CAISO. In-state resources would need to internalize emissions costs within their bids, resulting in higher bids than out-of-state resources that do not have the same emissions costs. The higher-carbon out-of-state bids would clear the market resulting in higher-carbon imports being substituted for in-state generation. Specific program designs cannot adequately address this issue. California’s implementation of an Emissions Performance Standard, which reduce the ability of California sellers to sign longer term contracts with high carbon resources, addresses this leakage in the long-term, but not in the short-term. Allowance allocation also cannot adequately address this issue.

Question 10. Given existing procurement oversight and the prospect for a regional or federal GHG program in the foreseeable future, how extensive do you expect the threat to be of a longer-term shift of production to regions beyond the reach of a California source-based cap-and-trade regime?

As stated above, the Emission Performance Standard addresses the long-term challenge of leakage by prohibiting California retail providers from signing contracts with terms equal to or greater than five years with any generator that has an emissions profile greater than a standard combined cycle generating turbine. Once a regional or national program is implemented, out-of-state resources will most likely be regulated at the source. At such time, California generators will not be at an economic disadvantage to importers in the short-term market.

⁹ Health & Safety Code § 38505(j).

Question 11. If emissions associated with imported power are excluded from a cap-and-trade program, what policies beyond the existing suite of program including energy efficiency, California Solar Initiative, RPS, and Emission Performance Standard (EPS) do you recommend that California employ to achieve the necessary reductions from the electricity sector?

The only reason to consider a cap-and-trade program that ignores imports is if the program will be short-lived and replaced with a federal or regional source-based cap-and-trade program. If this is the case, then only short-term programmatic measures should be pursued, such as increasing energy efficiency programs. Given that the AB 32 GHG program will go into effect in 2012, increasing the Renewables Portfolio Standard or California Solar Initiative will unlikely result in increased renewable purchases prior to the expected federal or regional program. An emissions performance standard, if based on an LSE's portfolio used to serve its load, suffers from the same market transaction and default emissions infirmities as a load-based cap.

Question 12. As the Public Utilities Commission does not currently have authority to oversee all energy efficiency and renewable procurement programs for all kinds of retail providers (investor owned utilities (IOUs), community choice aggregators (CCAs), electric service providers (ESPs), and publicly owned utilities (POUs)), which agency(ies) should fill in any gaps? Which agency should be responsible for overseeing energy efficiency and renewable procurement for POUs? Would the California Air Resources Board (ARB) have the authority to require certain energy efficiency and renewable targets be met by POUs?

As the Legislature has recognized, "under existing law the governing board of a local publicly owned electric utility is responsible for implementing and enforcing a renewables portfolio standard that recognizes the intent of the Legislature to encourage renewable resources."¹⁰ The California Energy Commission has some authority over renewables, but it is limited to the certification of eligible renewable energy resources and the design and implementation of an accounting system to verify compliance with the renewables portfolio

¹⁰ Senate Bill No. 13689, September 29, 2006, Legislative Counsel's Digest (1).

standard by retail sellers.¹¹ SCE has no recommendation regarding who should be responsible for overseeing energy efficiency and renewable procurement for non-CPUC jurisdictional entities at this time. However, SCE notes that, in light of current law, legislation would likely be necessary to give such authority to any entities other than the governing board of any local publicly owned utility (“POU”).

Currently, CARB is given very broad authority with respect to the control of GHG emissions. Among its powers are the ability to “adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emissions reductions” and the ability to enforce any rules, regulations, orders or other compliance mechanisms it adopts.¹² To the extent CARB decides that regulation of POU energy efficiency mechanisms or renewable portfolio standard mechanisms will help achieve the maximum technologically feasible and cost-effective reductions in GHG emissions, such regulations are arguably within the broad authority granted CARB, even though the two programs are not specifically referenced in the text of AB 32.

Question 13. What sources would a source-based system cover? Could it cover California utility-owned facilities located outside of California?

A source-based system should cover all electrical generation facilities that emit GHG. Specific details on these facilities are well documented and systems are currently in place to collect emissions data. A minimum capacity value should be selected to exclude smaller generation facilities where regulation would yield diminishing returns.

A source-based program that seeks to cover only utility-owned facilities located outside of California may be the subject of Commerce Clause scrutiny if such a program is determined to discriminate between in-state and out-of-state sources in a manner that does not regulate evenhandedly. Such a program would need to address questions such as whether out-of-state resources with in-state owners would have to report and obtain allowances while resources with

¹¹ Senate Bill No. 13689, September 29, 2006, Legislative Counsel’s Digest (1).

¹² Health & Safety Code § 38562(a).

out-of-state owners would not, and whether out-of-state resources with in-state owners would receive allowances while resources with out-of-state owners would not. Additionally, such a proposal would need to address how in-state entities, with co-ownership agreements for out-of-state generating facilities would be addressed. Until a detailed proposal for a source-based system covering utility-owned facilities located outside of California is developed, the full extent of a legal challenge cannot adequately be addressed.

One of the major shortfalls of a pure in-state only source-based system is the inability to regulate electricity imported from out-of-state, which could lead to significant leakage and compromise the effectiveness of a cap. In contrast, the First Seller approach combines the simplicity of a source-based system, with the ability to regulate imported electricity at the first point of sale in California. For this reason, as well as the other reasons set forth in SCE's previous comments, SCE supports a First Seller approach.¹³

Question 14. Would a strengthened EPS assist in reducing emissions due to California imports? What recommended changes would you make to the EPS?

SCE does not recommend any changes to the Emissions Performance Standard at this time. It is correctly designed to apply to new long term commitments, consistent with SB 1368. Any changes in the current threshold, such as applying it to shorter term transactions, is likely to cause unnecessary administrative and logistical complications, while not affecting actual dispatch of underlying resources and thus not reducing actual GHG emissions from underlying resources.

B. Deliverer/First Seller

Question 15. Please comment on the "First Seller Design Description" paper, which is Attachment A to this ruling. Does the paper accurately describe the deliverer/first seller program? If not, describe your concerns and include an accurate description from your perspective.

¹³ See Response of SCE to Administrative Law Judge's Comments and Legal Briefs on Market Advisory Committee Report, filed August 6, 2007.

The “First Seller Design Description” paper adequately describes the principles of the First Seller approach and also presents some of the potential approaches to counting and reporting imported emissions. The paper does state that allocating allowances to ratepayers (by way of LSEs) will reduce the cost of a First Seller approach. SCE agrees that LSEs should be allocated allowances on behalf of their ratepayers. However, SCE supports allocating allowances according to economic harm. While the bulk of economic harm will fall on ratepayers, a significant level of harm will also fall on other entities. SCE recommends a broad approach that allocates allowance value according to economic harm.

With respect to imported energy under the First Seller approach, the challenges of attributing emissions and tracking from source to sink are similar to those of a load-based cap. The key advantage of a First Seller approach is its ability to substantially improve the accuracy and environmental integrity of in-state emissions regulation. In addition, the advantage of the First Seller approach, compared to the load-based alternative, with respect to imported energy is that the First Seller must take responsibility for energy that is imported into California before it is bid into the CAISO market. This addresses the attribution challenge of market bids from imports.

C. Source-Based For In-State Generation, Load-Based for Imports

Question 16. Please describe in detail your view of how this option would work.

Under such a program, tracking in-state generation from source to sink is simplified, but all the perverse incentive challenges remain for imported energy. Because the CAISO market price will include the emissions value of in-state generation, importers will have additional incentive to bid low cost, high carbon generation into the CAISO. Importers will receive a higher price, but will have no emission obligation. The result of this program would be additional profits for imported generation, higher costs for California ratepayers, and no reduction in emissions from imported energy.

Question 17. Do you support such an approach? Why or why not?

For the reasons described in SCE's response to Question No. 16, SCE does not support the hybrid source-based approach for in-state generation and load-based for imports and considers it inferior to a First Seller approach.

Question 18. Does this approach have legal issues associated with it? Provide a detailed analysis and legal citations.

Such a hybrid approach may be subject to the same kind of Commerce Clause challenges as might be faced by either the First Seller or load-based approaches.¹⁴ Under this hybrid approach, LSEs would be obligated to use or buy emissions allowances when purchasing out-of-state power, but would seem to have no obligation to do so when purchased power can be traced to an in-state source. This would be the result of the hybrid approach's direct regulation of the in-state sources. However, it may become difficult to treat load-based purchases from out-of-state sellers in an apples-to-apples way with source-based in-state generation because the load-based generation will need to be aggregated and estimated in various ways. Such a disconnect between the manner in which in-state and out-of-state power are treated may give rise to an argument that the program unfairly favors California generation.

Question 19. If retail providers are responsible for internalizing the cost of carbon for imported power, all power generated in-state may need to be tracked to load to avoid double regulation of in-state power. Do you agree?

This answer depends on whether exports from in-state generation are included in the cap. In-state generation would need to be tracked from source to sink in the event that in-state generators had an incentive to export their emissions and return the generation as imported power under a lower emissions factor. However, in-state generators have no such incentive under a hybrid approach (such as that described in the Ruling) where in-state generators are required to provide allowances for all emissions regardless of whether electricity is exported or used to serve California load. Instead, such in-state generators will be required to provide

¹⁴ See Response of SCE to Administrative Law Judge's Comments and Legal Briefs on Market Advisory Committee Report, filed August 6, 2007, at 46-47.

allowances for all emissions at the source of generation and, thus, will not have an incentive to try to export the power and import it with a lower emission factor to reduce their compliance obligation.

Question 20. If that is the case, does a mixed source-based/load-based approach offer any advantages compared to a load-based approach in terms of simplifying reporting and tracking? What if the load-based system uses TEACs? How could imports be differentiated from in-state generation in a way that reduces the complexity of reporting and tracking compared to a load-based approach?

See responses to Questions 7 and 19 above. SCE does not support the mixed source-based/load-based approach or the TEAC approach.

V.

RESPONSES TO QUESTIONS REGARDING DEFERRAL OF A MARKET-BASED CAP-AND-TRADE SYSTEM

Question 21. How important is it that a cap-and-trade system be included in the near-term as part of the electricity sector's AB 32 compliance strategy?

When evaluating an option to delay the development of a market-based program, SCE suggests that potential California market-based solutions be evaluated based on how easily such a program can integrate within a national program. If a California program can seamlessly integrate into a national program it will be much easier for California to develop a program and then coordinate with a national program.

Alternatively, if California elects to delay the development of a market-based program and implements additional programmatic solutions, it is important that such programmatic solutions do not impose a dual burden on California. Thus, such programs should include a sunset provision that protects California ratepayers from duplicative regulatory burdens. Additionally, such programmatic solutions must apply to an equal footprint as would a market-based program. This means that such programmatic solutions would apply equally to all entities in the electricity sector (i.e. IOU, POU, ESP and CCA).

Question 22. Would your answer to Q21 be different if there is no market-based cap-and-trade system? If so, please explain.

If a national emissions reduction program is not developed, the ability to make a significant impact on the world-wide GHG emissions is challenged. In such a circumstance, California will need to carefully evaluate the efficacy of acting alone. Such an approach would impose significant economic burdens without any palpable impact on worldwide emissions.

While it is likely premature to conjecture, if California were to engage in an isolated approach, SCE recommends that a First Seller approach be chosen.

Question 23. Address the following:

- **How emission reduction obligations could be met if there is no cap-and-trade system for the electricity sector**

If there is no cap-and-trade system for the electricity sector, AB 32 may not obligate the electricity sector to undertake additional emission reduction obligations. AB 32 states that the state should pursue the most cost-effective GHG emission reduction measures. Given the significant amount of emission reductions already undertaken by the electricity sector (relative to other sectors), it is unlikely that the most cost effective GHG reduction measures would be found in the electricity sector. Before any emission reduction obligations are created, a comprehensive analysis should be conducted to determine which sectors would yield the most cost effective reductions. If such an analysis concluded that the most cost-effective GHG reduction measures would come from the electricity sector, then those measures should be evaluated on the basis of cost effectiveness and net impact. Reduction measures such as energy efficiency, which in theory has a negative cost, may not be cost effective if implemented beyond the market saturation point.

- **How increased programmatic goals could impact rates, and**

In theory, increased programmatic goals would raise rates more than a market-based approach. However, this is based on the assumption that the market-based approach is well designed and is not susceptible to market manipulation, such as contract shuffling. For example, under a load-based approach, which is more vulnerable to contract shuffling and could

compromise the efficiency of wholesale power markets, rates could be higher. In this case, it would be advantageous to the State to defer implementation of a market-based approach and wait for a regional/federal program.

- **How deferral of a cap-and-trade program for the electricity sector would facilitate or hinder California's integration into a subsequent regional or federal program.**

Deferral of a cap-and-trade program could enhance California's integration into a subsequent regional or federal program. However, California faces significant stranded costs if a market-based approach is deferred. If programmatic goals are used to bridge the gap between the present and the implementation of a regional/federal program, then the California electric sector may unnecessarily undertake costly emission reductions. Equivalent reductions may have been obtained for a lower cost through a cap-and-trade program.

If an electricity sector load-based cap is used to bridge the gap, not only would it incentivize contract shuffling and compromise the efficiency of wholesale markets in the interim, (similar to shorter term programmatic solutions outlined above) but the State would have to establish a costly administrative structure that would also need to be completely overhauled upon the implementation of a regional/federal program.

Question 24. How deferral of a cap-and-trade program for the electricity section would facilitate or hinder California's integrating into a subsequent regional or federal program.

See response to Question 23.

Question 25. If neither a regional system nor a national system is implemented within a reasonable timeframe, should California proceed with implementing its own cap-and-trade system for the electricity sector? If so, how long should California wait for other systems to develop before acting alone?

SCE supports a cap-and-trade approach to reducing emissions as a means to comply with AB 32. While the question of deferral has recently come up, a well-designed approach, such as a First Seller program, will most easily position California to transition to a national source-based cap and trade when such a national program is implemented. SCE does not support a load-based approach under any circumstance and it would be an unwise policy choice for California. As

was recently stated by the CAISO Market Surveillance Committee opinion, a load-based approach is inferior to a First Seller approach.¹⁵ While integrating with a national program is critically important, the challenges of a load-based approach go well beyond integration with a national source based program.¹⁶

Question 26. What flexible compliance mechanisms could be integrated into a non-market based GHG emission reduction approach?

A well-designed market based GHG emission reduction approach will lead entities to the most cost and technology effective way to achieve the GHG emission reduction targets prescribed under AB32. Furthermore, flexible compliance mechanisms, such as offsets and voluntary early actions, are more adaptable to market-based programs than to non-market based programs. In a market-based program, emission reductions that results from these flexible compliance systems could be used as a fungible commodity and traded among regulated entities. In contrast, conventional command and control compliance requirements typically provide little, if any, flexibility in meeting requirements.

SCE urges that flexible compliance mechanisms be adapted to a non-market based approaches to the extent that market based approaches are not utilized. Innovative compliance options, such as offsets and voluntary early actions, should be considered as alternative compliance measures to additional command and control requirements. Furthermore, emission reductions that exceed the requirements of a command and control requirement should be used as a credit against the total emission reduction requirements of a regulated entity. These types of flexible mechanisms would help to reduce the cost impacts of conventional command and control compliance requirements.

¹⁵ CAISO Market Surveillance Committee Opinion on Load-Based and Source-Based Trading of Carbon Dioxide in California, adopted on November 27, 2007.

¹⁶ See Response of SCE to Administrative Law Judge's Comments and Legal Briefs on Market Advisory Committee Report, filed August 6, 2007, at 18-26.

Question 27. If a market-based cap-and-trade system is not implemented for the electricity section in 2012, how would you recommend addressing early actions that entities may have undertaken in anticipation of a market?

As mentioned in response to Question 26, early actions are more easily incorporated in a market-based approach than a traditional command and control approach. However, absent a marketplace, early actions that entities have undertaken in anticipation of a market must still be accounted for in an equitable manner. Emission reductions from these early actions should be used as a credit against the reductions that an entity is required to make from command and control measures. For example, the emission requirements from those command and control measures could be proportionally reduced as a result of the early actions undertaken. Without this assurance, there would be no incentive for entities to undertake voluntary early actions. AB 32 itself states that the State should “ensure that entities that have voluntarily reduced their GHG emissions prior to the implementation of this section receive appropriate credit for early voluntary reductions.”¹⁷

VI.

**RESPONSES TO QUESTIONS REGARDING RECOMMENDATION AND
COMPARISON OF ALTERNATIVES**

Question 28 [Q29] Submit your comprehensive proposal for the approach California should utilize regarding the point of regulation and whether California should implement a cap-and-trade program at this time for the electricity sector. If you recommend that another approach be considered besides those detailed above, propose it here. If you recommend one of the above options, give as detailed a discussion as possible of how the approach would work.

SCE supports the First Seller cap-and-trade approach endorsed in the California Market Advisory Committee Report. Such a program would provide a source-based cap for in-state generators, while placing compliance obligations on California’s first sellers of imported energy. As discussed above, a First Seller approach greatly simplifies the measurement and accounting

¹⁷ Health & Safety Code § 38562(b)(3).

of emissions from in-state generation. There is no need to track in-state generation from source to sink. Additionally, under a First Seller approach, emission costs are internalized in the bids generators make into the CAISO market. As such, generators have no incentive to alter their bidding behavior due to emissions compliance rules.

Finally, a First Seller approach will more easily enable California to integrate into a national cap-and-trade program.

Question 29. Address and compare how each of the alternatives identified in the above questions, and the proposal you submit in response to the preceding question, would perform relative to each of the principles or objectives listed above and any other principles or objectives you propose. For each alternative, address important tradeoffs among the principles.

SCE's refers to its previous comments on point of regulation issues filed in this docket on August 6, 2007 and August 15, 2007, as well as SCE's responses to the questions above.

VII.

CONCLUSION

For all of the foregoing reasons, SCE continues to urge the CPUC to adopt a First Seller approach to a cap-and-trade system for California.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY ON ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS ON TYPE AND POINT OF REGULATION ISSUES on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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